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October 29, 2013

The Honorable Jocelyn Boyd Chief Clerk of the Commission Public Service Commission of South Carolina Post Office Drawer 11649 Columbia, South Carolina 29211

Re:

AT&T South Carolina's Petition to Withdraw Funds from the State USF to Support Stand-Alone Basic Residential Lines Pursuant to S.C. Code Ann. §58-9-

576(C)(9)(c)

Docket No. 2011-406-C

Dear Ms. Boyd:

Enclosed for filing is AT&T South Carolina's Motion for Expedited Ruling Based on Verified Testimony in the above-referenced matter.

By copy of this letter, I am serving all parties of record, as well as counsel for the South Carolina Telephone Coalition and the South Carolina Cable Telephone Association, with a copy of this pleading as indicated on the attached Certificate of Service.

Sincerely,

Patrick W. Turner

PWT/nml Enclosure

cc:

All Parties of Record

Counsel for South Carolina Telephone Coalition

Counsel for South Carolina Cable Telephone Association

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## BEFORE THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

In Re:	AT&T SOUTH CAROLINA'S PETITION TO	)
	WITHDRAW FUNDS FROM THE STATE USF TO	)
	SUPPORT STAND-ALONE BASIC RESIDENTIAL	) Docket No. 2011-406-C
	LINES PURSUANT TO S.C. CODE ANN.	)
	§58-9-576(C)(9)(c)	)
		)

## MOTION FOR EXPEDITED RULING BASED ON VERIFIED TESTIMONY

AT&T South Carolina respectfully requests that the Commission enter an Order: allowing it to withdraw \$628,749 from the State USF for the upcoming 2014 State USF Fund year in support of the 12,656 stand-alone basic residential lines that were in service as of October 1, 2009 and that remain in service<sup>1</sup>; and directing AT&T South Carolina to work with the Office of Regulatory Staff ("ORS") to determine the amount of any "overages" in the support it has received as a result of its 2011 and 2012 requests and to file in this docket a proposal for equitably remedying any such overcharges. In order to allow the ORS to timely calculate the State USF surcharge, AT&T South Carolina respectfully requests that the Commission grant this Motion during its November 6, 2013, Agenda Conference. AT&T South Carolina has consulted with counsel for the ORS, the South Carolina Telephone Coalition ("SCTC"), and the South Carolina Cable Television Association ("SCCTA") and confirmed that neither the ORS, SCTC, nor SCCTA object to these requests.

This is in addition to the amounts AT&T South Carolina is entitled to continue withdrawing from the State USF that are needed to fund the state Lifeline match that is necessary to ensure that low-income persons enrolled in the Lifeline program receive the maximum federally funded Lifeline amounts available. See S.C. Code Ann. §58-9-576(C)(9)(d).

On July 1, 2013, AT&T South Carolina filed its Notice of Filing Calculation of State USF Support ("Notice") in this docket. On August 15, 2013, the Commission issued a letter directing AT&T South Carolina to publish the Commission's Notice of Filing ("NOF") in this docket in newspapers of general circulation in the affected areas on or before August 25, 2013, and to provide Proof of Publication on or before September 26, 2013. The Commission's NOF establishes September 26, 2013 as the deadline for persons to file a Petition to Intervene or to notify the Commission, the ORS, and AT&T South Carolina in writing that they wish to testify and present evidence in the docket or if they wish to be notified of any change in the hearing.

On September 12, 2013, AT&T South Carolina filed with the Commission affidavits reflecting that the NOF was published in newspapers of general circulation in the affected areas prior to the deadline established by the Commission. As of October 29, 2013, no person has filed a Petition to Intervene or a written notice that they wish to testify and present evidence in the docket or that they wish to be notified of any change in the hearing.

On October 25, 2013, AT&T South Carolina filed the verified testimony of Kenneth E. Minzenberger in support of its Notice, as adjusted in that testimony. Mr. Minzenberger explains that AT&T South Carolina is reducing the amount of support it is requesting for the 2014 State USF Fund Year by \$85,725 to adjust for the fact that Notice inadvertently overstates (by 1,749) the number of lines entitled to support for the 2014 State USF Fund Year. Mr. Minzenberger also asks the Commission to direct AT&T South Carolina to work with the ORS to determine the amount of any "overages" in the support it has received as a result of its 2011 and 2012 requests and to file in this docket a proposal for equitably remedying any such overcharges.

Accordingly, AT&T South Carolina respectfully requests that the Commission address this Motion during it November 6, 2013 Agenda Session and: allow AT&T South Carolina to

withdraw \$628,749 from the State USF for the upcoming 2014 State USF Fund year in support of the 12,656 stand-alone basic residential lines that were in service as of October 1, 2009 and that remain in service; and direct AT&T South Carolina to work with the ORS to determine the amount of any "overages" in the support it has received as a result of its 2011 and 2012 requests and to file in this docket a proposal for equitably remedying any such overcharges.

Respectfully submitted this 29th day of October, 2013.

BELLSOUTH TELECOMMUNICATIONS, LLC

d/b/a AT&T SOUTH CAROLINA

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STATE OF SOUTH CAROLINA	)	
	)	CERTIFICATE OF SERVICE
COUNTY OF RICHLAND	)	

The undersigned, Nyla M. Laney, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, LLC d/b/a AT&T South Carolina ("AT&T") and that she has caused AT&T South Carolina's Motion for Expedited Ruling Based on Verified Testimony in Docket No. 2011-406-C to be served upon the following on October 29, 2013:

Nanette S. Edwards Counsel Office of Regulatory Staff 1401 Main Street, Suite 900 Columbia, South Carolina 29201 (Electronic Mail)

Frank Ellerbe, III, Esquire Bonnie D. Shealy, Esquire Robinson, McFadden Post Office Box 944 Columbia, South Carolina 29202 (SCCTA) (Electronic Mail)

M. John Bowen, Jr., Esquire Margaret M. Fox, Esquire McNair Law Firm Post Office Box 11390 Columbia, South Carolina 29211 (SCTC) (Electronic Mail)

F. David Butler, Esquire Senior Counsel S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail) Joseph Melchers General Counsel S.C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

Jocelyn G. Boyd, Esquire Chief Clerk S. C. Public Service Commission Post Office Box 11649 Columbia, South Carolina 29211 (PSC Staff) (Electronic Mail)

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